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Counsel for *ProctorU, Inc. d/b/a Meazure Learning*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KATRINA MCDOWELL,
individually and on behalf of all
others similarly situated,

Plaintiff,

v.

PROCTORU, INC. d/b/a
MEASURE LEARNING,

Defendant.

Case No. 5:25-cv-00705

**PROCTORU, INC.'S NOTICE OF
MOTION AND MOTION TO STAY OR
TRANSFER UNDER THE FIRST-TO-
FILE RULE**

Date: May 15, 2025
Time: 8:30 a.m.
Courtroom: 9D

Complaint Filed: March 17, 2025

TO PLAINTIFF KATRINA MCDOWELL AND HER ATTORNEYS OF
RECORD:

NOTICE IS HEREBY GIVEN that on May 15, 2025, at 8:30 a.m., or as soon
thereafter as counsel may be heard by the above-entitled Court, located at 350 West
1st Street, Los Angeles, CA 90012, in the courtroom of Judge George H. Wu,
Defendant ProctorU, Inc. d/b/a Meazure Learning will and hereby does move the
Court to stay this action pending the resolution of *Laura Perjanik, et al. v. ProctorU,
Inc. d/b/a Meazure Learning*, No. 4:25-cv-2095-JST (N.D. Cal.) and *Trisha A.M. v.*

1 *ProctorU, Inc. d/b/a Meazure Learning*, No. 4:25-cv-02197 (N.D. Cal.), or in the
2 alternative transfer this action to the Northern District of California. This motion is
3 brought on the grounds that under the first-to-file rule, a stay is warranted because
4 two other putative class actions are materially identical to this action and were filed
5 first in the Northern District of California. This motion is made following the
6 conference of counsel pursuant to L.R. 7-3, which took place on April 8, 2025.

7 This motion is based on this Notice of Motion and Motion, the Memorandum
8 of Points and Authorities filed herewith, the pleadings and papers on file herein, and
9 upon such other evidence or argument as may be presented to the Court at the time
10 of the hearing.

11 Dated: April 15, 2025

/s/ Emma Leheny
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